

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re,  NATHANIEL MESSER ALETHEA MESSER Debtors,  GLOBAL LENDING SERVICES LLC Movant,  v.  NATHANIEL MESSER, and ALETHEA MESSER, and KENNETH E. WEST, Trustee, Respondents.	Bankruptcy No. 22-10893-amc  Chapter 13
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MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW COMES, Movant, Global Lending Services LLC (the “Movant”), by and through its undersigned counsel, Bernstein-Burkley, P.C., and files this Motion for Relief from the Automatic Stay (the “Motion”), representing as follows:

THE PARTIES

1. Respondents, Nathaniel Messer and Alethea Messer, (“Debtors”), are adult individuals with a place of residence located at 867 Gartner Lane, Langhorne, PA 19047.
2. Kenneth E. West is the duly appointed Chapter 13 Trustee and is currently acting in such capacity.

JURISDICTION AND VENUE

3. This matter is a core proceeding, and this Court has jurisdiction pursuant to 28 U.S.C. § 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. Movant seeks relief pursuant to 11 U.S.C. § 362(d) and FRBP 4001 and 9014.

FACTUAL BACKGROUND

4. On or about April 5, 2022, Debtors filed a voluntary petition for relief pursuant to Chapter 13 of the Bankruptcy Code.

5. On or about March 24, 2018, Debtors, entered into a Retail Installment Sales Contract (“Note”) with the Movant for the purchase of 2018 Nissan Rogue, VIN: KNMAT2MV2JP546028 (the “Vehicle”) with the Movant, a true and correct copy of which is attached hereto as **Exhibit A**.

6. Movant has a secured interest in the Vehicle, as evidenced by the Certificate of Title attached hereto as **Exhibit B**.

7. The loan matured on April 6, 2024; Movant no longer has a contractual relationship with the Debtors.

8. The total balance due on the Note as of December 31, 2024, was \$15,454.00.

9. The J.D. Power value for the 2018 Nissan Rogue, VIN: KNMAT2MV2JP546028 is \$11,525.00. A true and correct copy of a printout showing that value is attached hereto as **Exhibit C**.

10. Movant is entitled to relief from the automatic stay for cause due to the Debtor’s failure to maintain their contractual obligation with the Movant as described in the Note and making post-petition payments.

WHEREFORE, Movant, Global Lending Services LLC, respectfully requests that this Honorable Court enter an Order, pursuant to 11 U.S.C. § 362(d), granting Movant relief from stay with respect to 2018 Nissan Rogue, VIN: KNMAT2MV2JP546028.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Keri P. Ebeck  
Keri P. Ebeck, Esq.  
PA I.D. # 91298  
[kebeck@bernsteinlaw.com](mailto:kebeck@bernsteinlaw.com)  
601 Grant Street, 9<sup>th</sup> Floor  
Pittsburgh, PA 15219  
Phone (412) 456-8112  
Fax: (412) 456-8135

*Counsel for Global Lending Services LLC*

Dated: January 21, 2025